

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 1:17-CR-13

Plaintiff,

v.

MATTHEW JOHN ANDALUZ,

HON. ROBERT J. JONKER
Chief U.S. District Judge

Defendant.

STIPULATION OF FACT

The parties stipulate and agree to the following:

Government Exhibits 101 – 119 are nineteen photographs that comprise what is known as the “Cord Over Brown” series of child pornography. Electronic copies of some or all of these images have been found during a number of child pornography investigations around the country, including cases in Vermont, Washington state, and New York. Investigators in those cases submitted electronic copies of the images to NCMEC (that is, the National Center for Missing and Exploited Children). NCMEC analyzed the images and learned that they had been created in late 2010 and early 2011 with a Nikon D3000 digital camera with serial number 3437590. NCMEC and the Federal Bureau of Investigation (FBI) provided authentic electronic copies of these images to Homeland Security Investigations as part of the investigation in this case.

Respectfully submitted,

Dated: June 3, 2017

Helen Nieuwenhuis
HELEN NIEUWENHUIS
Counsel for the Defendant

Dated: June 3, 2017

Matthew Andaluz
MATTHEW JOHN ANDALUZ
Defendant

Dated: May 31, 2017

/s/ Sean M. Lewis
SEAN M. LEWIS
Assistant United States Attorney